

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA

UNITED STATES OF AMERICA	:	
	:	
v.	:	
	:	5:25CR106
TIJEMA BROWN,	:	
	:	
	:	
Defendant.	:	

MOTION TO CONTINUE DOCKET CALL

NOW COMES the Defendant, TIJEMA BROWN, by and through counsel, James E. Quander, and respectfully moves this Honorable Court for an order continuing the November 3, 2025, Docket Call. In support of said Motion, the Defendant shows unto the Court the following:

1. On May 21, 2025, the Defendant was charged in a multi-count and multi-defendant bill of indictment alleging, conspiracy to commit wire fraud and wire fraud, in violation of 18 U.S.C. §§ 1349 and 1343.
2. On May 23, 2025, the Defendant was arraigned and entered a plea of not guilty and requested a trial by jury.
3. On October 1, 2025, the undersigned counsel accepted appointment to represent the Defendant under the Criminal Justice Act after previous counsel was allowed to withdraw.
4. On June 9, 2025 and August 3, 2025, the Court entered has entered orders granting Defendant's motion to continue the Docket Calls in this matter. On August 3, 2025, the Court entered an order continuing the Docket Call until November 3, 2025.

5. The undersigned counsel and counsel for the government are still engaging in good faith plea negotiations.

6. Undersigned counsel will be starting a trial in the United States District Court for the Middle District of North Carolina the week of October 27, 2025. (United States v. Wendy Rizo Bodden; 1:25CR188-9).

7. Counsel has discussed this motion with counsel for the government and that counsel for the government, Matthew T. Warren, advises that this motion is unopposed.

8. That this continuance requested is not made for the purpose of delay.

9. The period of delay, if any, occasioned by this continuance should be excluded in computing the time within which Defendant's trial must commence pursuant to 18 U.S.C. § 3161 (The Speedy Trial Act) as the ends of justice served by any such delay outweigh the best interests of the public and the Defendant in a speedy trial.

WHEREFORE, based upon the foregoing, Defendant respectfully requests this Court to enter an order continuing the Docket Call in this matter.

Respectfully submitted this the 2nd day of October, 2025.

/s/ James E. Quander

JAMES E. QUANDER
Attorney for Defendant
N.C. Bar No. 25472
Womble Bond Dickinson
One West 4th Street
Winston-Salem, NC 27101
Email: jimmy.quander@wbd-us.com

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CERTIFICATE OF SERVICE

I, James E. Quander, do hereby certify that the foregoing MOTION TO CONTINUE TRIAL TERM was filed using the CM/ECF electronic filing system, which will automatically send notice of this filing to the following individual:

Matthew Thomas Warren
Assistant United States Attorney
matthew.warren@usdoj.gov

Benjamin Bain-Creed
Assistant United States Attorney
benjamin.bain-creed@usdoj.gov

This the 2nd day of October, 2025.

/s/ JAMES E. QUANDER
Attorney for Defendant
NCSB #25472
Womble Bond Dickinson
One West 4th Street
Winston-Salem, NC 27101
Email: jimmy.quander@wbd-us.com